

MEMORANDUM

TO: Jumbo Mine File

FROM: Mark Novak

DATE: June 7, 1996

SUBJECT: June 6, 1996 Inspection of Mine Site

I inspected the Jumbo Mine site on June 6, 1996, accompanied by Wayne Hedberg and Tom Munson of DOGM and Sheri Wysong of BLM. Dave Hartshorn represented Jumbo.

The purpose of the inspection was to assess conditions at the site before the involved agencies (probably DWQ, DOGM and BLM only) proceed with enforcement actions or other regulatory actions related to reclamation at the site. The current effort at enforcement was started early in 1995 when an inspection by a contractor for BLM revealed numerous violations of state and federal environmental regulations. In addition, the site has been inactive since 1990 and the involved agencies would like to see action taken on unresolved permitting and reclamation issues. DWQ is particularly concerned with deteriorating facilities subject to the Ground Water Regulations which may cause an unacceptable discharge of pollutants.

Dave Hartshorn informed us that environmental concerns which were regulated by DERR had been satisfactorily resolved. These issues were regarding petroleum storage tanks and drums, batteries and used oil which had been managed improperly. Mr. Hartshorn provided a letter from Kent Gray stating no further action was required at the site. I checked with Doug Taylor of DSHW on Jumbo's status with them. They had concerns that the contents of a cyanide mixing tank might be hazardous waste, and had requested that BLM do a TCLP analysis, but this request had been lost because of changes in personnel at BLM.

I inspected the leach pads and process water ponds where deterioration had been observed at the inspection on March 20, 1996. Jumbo has not done anything to correct these problems. The attached photos show broken pipelines from the leach pads to the pregnant pond, also observed last year. Under these conditions precipitation will leach contaminants which could include cyanide, metals and alkalai from the ore stacked on the pads, and release them to the ground surface at the pipeline breaks. The photos also show deterioration in the exposed liners at the edges of the pads, which was also observed last year. The condition of liners under the stacked ore is unknown.

Mr. Hartshorn had not received our latest letter responding to Jumbo's request for an extension

in the deadlines for either submitting a corrective action proposal or applying for a ground water discharge permit as stated in our January 18, 1996 letter. I informed him of the content of the letter and that we had denied the request. I clarified for Mr. Hartshorn DWQ's expectations of what reclamation should accomplish. To satisfy DWQ's concerns, Jumbo should demonstrate that the site will be managed appropriately to prevent unacceptable releases of contaminants.

DOGM is making an inventory of facilities on the site in order to determine a proper reclamation bond. The next step in this process will be a joint meeting of DWQ, DOGM and BLM to determine a strategy for enforcement.